

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

---

**IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION**

**THIS DOCUMENT RELATES TO:**

*Gaston Roberts, et al. v. Zhejiang  
Pharmaceutical Co., et al.,*

Case No. 1:20-cv-00946-RBK-JS

---

§  
§  
§  
§  
§  
§  
§  
§

**MDL NO. 2875**

**HON. ROBERT B. KUGLER**

**NOTICE OF VIDEOTAPED DEPOSITION OF**  
**PLAINTIFF JAN BOUTWELL ROBERTS**

**PLEASE TAKE NOTICE** that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Solco Healthcare U.S., LLC, and Princeton Pharmaceutical Inc., will take the deposition upon oral examination of Jan Boutwell Roberts, on **May 25, 2021 at 9:00 a.m. CDT (10:00 a.m. EDT)**, and continuing until completion, via remote deposition while the witness is at her home or office or other location agreed to by the parties. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person

duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The court reporter and videographer will be an employee or agent of Veritext Legal Solutions.

The attorney contact for the deposition is:

Dawnn E. Briddell  
Duane Morris LLP  
1940 Route 70 East, Suite 100  
Cherry Hill, NJ 08003  
(856) 874-4273  
[dbriddell@duanemorris.com](mailto:dbriddell@duanemorris.com)

Date: April 23, 2021

Respectfully submitted,

/s/ Dawnn E. Briddell  
Dawnn E. Briddell (001071987)

Duane Morris LLP  
1940 Route 70 East, Suite 100  
Cherry Hill, NJ 08003  
Tel: (856) 874-4273  
Fax: (856) 874-4633  
[dbriddell@duanemorris.com](mailto:dbriddell@duanemorris.com)

*Attorney for Zhejiang Huahai  
Pharmaceutical Co., Ltd., Solco Healthcare  
U.S., LLC, and Princeton Pharmaceutical  
Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23<sup>rd</sup> day of April, 2021, I caused a true and correct copy of the foregoing Notice of Videotaped Deposition of Plaintiff Jan Roberts to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was originally served on the following Plaintiff's counsel by e-mail, with copies by e-mail to Counsel for Defendants:

Daniel A. Nigh, Esq., (counsel for Plaintiff Jan Roberts)  
Don McKenna, Esq., (counsel for Plaintiff Jan Roberts)  
Adam Slater, Esq. (via email, for distribution to Plaintiffs' Counsel)  
Ruben Honik, Esq. (via email)  
David Stanoch, Esq. (via email)  
Conlee Whiteley, Esq. (via email)  
Jessica Priselac, Esq. (via email, for distribution to Defendants' Counsel)  
Seth A. Goldberg, Esq. (via email)  
Clem C. Trischler, Esq. (via email)  
Sarah E. Johnston, Esq. (via email)  
Veritext Legal Solutions (via email)

/s/ Dawnn E. Briddell  
Dawnn E. Briddell (001071987)  
Duane Morris LLP  
1940 Route 70 East, Suite 100  
Cherry Hill, NJ 08003  
Tel: (856) 874-4273  
Fax: (856) 874-4633  
[dbriddell@duanemorris.com](mailto:dbriddell@duanemorris.com)

*Attorney for Zhejiang Huahai Pharmaceutical Co.,  
Ltd., Solco Healthcare U.S., LLC, and Princeton  
Pharmaceutical Inc.*